

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11195 (JKS)

(Jointly Administered)

Re: Docket No. 414

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
FIRST OMNIBUS MOTION FOR ENTRY OF AN ORDER
(I) AUTHORIZING ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to Steven Balasiano, solely in his capacity as the Liquidation Trustee (the “Liquidation Trustee”) of the Zen JV Liquidation Trust (the “Liquidation Trust”), hereby certifies as follows:

1. On October 3, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed the *Debtors’ First Omnibus Motion for Entry of an Order (I) Authorizing Assumption and Assignment of Certain Executory Contracts and (II) Granting Related Relief* [Docket No. 414] (the “First Assumption Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the First Assumption Motion (the “Proposed Order”). Attached as Exhibit 1 to the Proposed

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

Order was a schedule identifying the executory contracts that are subject to the First Assumption Motion (the “Assumed Contracts Schedule”).

2. Responses, if any, to the First Assumption Motion were to be filed no later than 4:00 p.m. (prevailing Eastern Time) on October 17, 2025 (the “Response Deadline”).

3. Prior to the Response Deadline, Bullhorn Inc. (“Bullhorn”) informally objected to the assumption of the executory contract between Bullhorn and Monster Worldwide, Inc. listed on the Assumed Contracts Schedule (the “Bullhorn Contract”).

4. Bold Holdings LLC, the purchaser for the executory contracts listed on Assumed Contracts Schedule (the “Purchaser”), subsequently agreed with Bullhorn to revise the cure amount for the Bullhorn Contract.

5. Accordingly, attached hereto as **Exhibit A** is a revised proposed form of order (the “Revised Proposed Order”), and attached thereto as **Exhibit 1** is a revised schedule of executory contracts revising the cure amount for the Bullhorn Contract (the “Revised Assumed Contracts Schedule”).

6. A blackline comparison of the Revised Proposed Order marked against the Proposed Order filed with the First Assumption Motion is attached hereto as **Exhibit B**.

7. Other than as set forth herein, the Liquidating Trustee has not received any other informal objections or responses to the First Assumption Motion.

8. No formal objections or responses to the First Assumption Motion have been filed.

WHEREFORE, counsel for the Liquidation Trustee respectfully requests that the Revised Proposed Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: November 10, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
Melissa M. Hartlipp (No. 7063)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
jalberto@coleschotz.com
mhartlipp@coleschotz.com

-and-

Seth Van Aalten (admitted *pro hac vice*)
Sarah A. Carnes (admitted *pro hac vice*)
1325 Avenue of the Americas, 19th Floor
New York, NY 10019
Telephone: (212) 752-8000
svanaalten@coleschotz.com
scarnes@coleschotz.com

Counsel to the Liquidation Trustee